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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR LATE ACCEPTANCE OF RESPONSES OF WITNESS CAMPBELL  
TO KEYSpan INTERROGATORIES  
(April 3, 2000)

The United States Postal Service hereby moves that it be permitted to file two days late the responses of witness Campbell to the following interrogatories of KeySpan Energy: KE/USPS-T29-24 through 30, 32, and 36, 37 and 39 through 41.

These interrogatories were part of a set of approximately 100 questions filed as interrogatories KE/USPS-T29-24 through 47 on March 15, 2000. The responses filed on March 31<sup>st</sup> were due to have been filed on March 29<sup>th</sup>.

Many of the questions are interrelated and required extensive consultation with other headquarters and field personnel, making it impossible to complete the preparation of responses within the prescribed 14-day time limit. The witness has worked diligently to provide the responses that were filed on March 31<sup>st</sup>, and will strive to complete the remaining responses as expeditiously as possible.

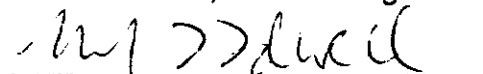
The Postal Service considers that no party will be prejudiced by the filing of the responses two days late, on March 31<sup>st</sup>.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

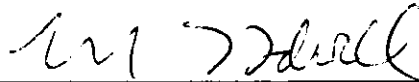
Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking



Michael T. Tidwell

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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April 3, 2000